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United States District Court
Southern District of Texas
FILED

APR 26 2016

David J. Bradley, Clerk

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN DIVISION

UNSEALED

UNITED STATES OF AMERICA	§	
	§	
v.	§	Criminal No. M-16-551
	§	
JAVIER SALINAS REYNA	§	
ROOSEVELT ANTONIO FAZ	§	
GUILLERMO TREVINO	§	
TED VIDAL CANTU	§	
ERWIN ROLANDO CONTRERAS-MATA	§	
SANDRA HARO	§	
MARIA ELENA BONILLA-TORRES	§	

SEALED INDICTMENT

THE GRAND JURY CHARGES:

Count One

From on or about November 1, 2011, to on or about March 28, 2016, and continuing up to and including the date of this indictment, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**JAVIER SALINAS REYNA
ROOSEVELT ANTONIO FAZ
GUILLERMO TREVINO
TED VIDAL CANTU
ERWIN ROLANDO CONTRERAS-MATA
SANDRA HARO
and
MARIA ELENA BONILLA-TORRES**

did knowingly and intentionally combine, conspire, confederate and agree together and with others known and unknown to the grand jury, to knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce which in fact involved the proceeds of a specified unlawful activity, that is, the distribution of controlled substances, in

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violation of Title 21, United States Code, knowing that the transactions were designed in whole or in part to conceal or disguise the nature, location, source, ownership, and control of proceeds of the specified unlawful activity.

In violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 1956(h).

Count Two

On or about February 4, 2015, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

JAVIER SALINAS REYNA
ROOSEVELT ANTONIO FAZ
and
GUILLERMO TREVINO

knowing that the property involved in a financial transaction represented proceeds of unlawful activity, that is, the distribution of controlled substances, in violation of Title 21, United States Code, attempted to conduct a financial transaction which in fact involved the proceeds of said specified unlawful activity, to wit: $130,000.00 in U.S. Currency, knowing that the transaction was designed in whole or in part to conceal the nature, location, source, ownership, and control of the proceeds of said specified unlawful activity.

In violation of Title 18, United States Code, Section 1956(a)(1)(B)(i) and 2.

Count Three

On or about February 7, 2015, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

JAVIER SALINAS REYNA
ROOSEVELT ANTONIO FAZ
and
TED VIDAL CANTU

knowing that the property involved in a financial transaction represented proceeds of unlawful

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activity, that is, the distribution of controlled substances, in violation of Title 21, United States Code, attempted to conduct a financial transaction which in fact involved the proceeds of said specified unlawful activity, to wit: $440,000.00 in U.S. Currency, knowing that the transaction was designed in whole or in part to conceal the nature, location, source, ownership, and control of the proceeds of said specified unlawful activity.

In violation of Title 18, United States Code, Section 1956(a)(1)(B)(i) and 2.

Count Four

On or about December 8, 2015, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

JAVIER SALINAS REYNA
ROOSEVELT ANTONIO FAZ
GUILLERMO TREVINO
and
ERWIN ROLANDO CONTRERAS-MATA

knowing that the property involved in a financial transaction represented proceeds of unlawful activity, that is, the distribution of controlled substances, in violation of Title 21, United States Code, attempted to conduct a financial transaction which in fact involved the proceeds of said specified unlawful activity, to wit: $300,206.00 in U.S. Currency, knowing that the transaction was designed in whole or in part to conceal the nature, location, source, ownership, and control of the proceeds of said specified unlawful activity.

In violation of Title 18, United States Code, Section 1956(a)(1)(B)(i) and 2.

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Count Five

On or about March 28, 2016, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

JAVIER SALINAS REYNA
SANDRA HARO
and
MARIA ELENA BONILLA-TORRES

knowing that the property involved in a financial transaction represented proceeds of unlawful activity, that is, the distribution of controlled substances, in violation of Title 21, United States Code, attempted to conduct a financial transaction which in fact involved the proceeds of said specified unlawful activity, to wit: $157,800.00 in U.S. Currency, knowing that the transaction was designed in whole or in part to conceal the nature, location, source, ownership, and control of the proceeds of said specified unlawful activity.

In violation of Title 18, United States Code, Section 1956(a)(1)(B)(i) and 2.

NOTICE OF FORFEITURE
18 U.S.C. § 982

1. The allegations contained in Counts 1-5 of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 982.

2. Pursuant to Title 18, United States Code, Section 982, and upon conviction of an offense in violation of Title 18, United States Code, Section 1956, the defendants,

JAVIER SALINAS REYNA
ROOSEVELT ANTONIO FAZ
GUILLERMO TREVINO
TED VIDAL CANTU
ERWIN ROLANDO CONTRERAS-MATA
SANDRA HARO
and
MARIA ELENA BONILLA-TORRES

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shall forfeit to the United States of America all property, real and personal, involved in the offenses charged in Counts 1-5, including, but not limited to, the following property: $5,000,000.00 in United States currency.

MONEY JUDGMENT

Defendant is notified that upon conviction, a money judgment may be imposed equal to the total value of the property subject to forfeiture, as stated herein.

SUBSTITUTE ASSETS

Defendant is notified that in the event that property subject to forfeiture, as a result of any act or omission of defendant, (A) cannot be located upon the exercise of due diligence; (B) has been transferred or sold to, or deposited with, a third party; (C) has been placed beyond the jurisdiction of the court; (D) has been substantially diminished in value; or (E) has been commingled with other property that cannot be divided without difficulty, the United States will seek to forfeit any other property of the defendant up to the total value of the property subject to forfeiture, pursuant to Title 21, United States Code, Section 853(p), as incorporated by reference in Title 28 United States Code, Section 2461(c) and in Title 18, United States Code, Section 982(b).

A TRUE BILL

FOREPERSON

KENNETH MAGIDSON
UNITED STATES ATTORNEY

ASSISTANT UNITED STATES ATTORNEY